



Toni Acton
Associate Director

SBC Telecommunications Inc.
1401 I Street NW, Suite 400
Washington, D.C. 20005
Phone 202 326-8843
Fax 202 408-4807

July 8, 2004

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 96-115, Telecommunications Carriers' Use of Customer
Proprietary Network Information and Other Customer Information, and
CC Docket No. 96-98, Implementation of the Local Competition Provisions
Of the Telecommunications Act of 1996, and
CC Docket 99-273, Provision of Directory Listing Information Under
the Telecommunications Act of 1934, As Amended

Dear Ms. Dortch:

On October 27, 1999, SBC Communications, Inc. ("SBC") filed a Petition for
Clarification or Reconsideration Regarding Directory Assistance and Operator Services in the
above referenced dockets.

In the Petition, SBC requested that the Commission clarify or reconsider the following
issues:

1. That the nondiscriminatory procedures applicable to multiple and conflicting requests
for subscriber lists also apply to multiple and conflicting requests for DA listing data;
2. That LECs do not have an obligation to provide competitors nondiscriminatory access
to OS/DA adjunct features, but only have to provide competitors nondiscriminatory
access to OS/DA adjunct features in conjunction with their provision of OS/DA
service in its entirety; and
3. That OS/DA unbundling requirements are governed by section 251(c)(3), and Section
251(b)(3) can not be read to impose a separate unbundling requirement.

SBC no longer seeks clarification of the first issue described above, but continues to seek clarification or reconsideration of the remaining two issues.

If you have any questions, please contact Toni Acton at 202-326-8843.

Sincerely,

/s/ Toni R. Acton

cc: Rodney McDonald